

## FEDERAL ELECTION COMMISSION

WASHINGTON, O.C. 20463

RQ-2

Robert M. Duncan, Treasurer Republican National Committee -- RNC 310 First Street S.E. Washington, DC 20003

JUL 2 4 2002

Identification Number:

C00003418

Reference:

Amended July Monthly Report (6/1/01-6/30/01), received 4/24/02

Dear Mr. Duncan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The Commission notes the refund to Charles Swindells and the transferout of the receipt from Consumer Freedom (pertinent portions attached). Please provide the date of the original deposit into the federal account and amend the appropriate report to disclose the receipt of these funds on Schedule A supporting the appropriate line of the Detailed Summary Page.

Although the Commission may take further legal action regarding the misdeposited funds, your prompt action in transferring-out this amount will be taken into consideration.

-Please clarify all expenditures made for AD COST, PRODUCTION COST, VIDEO SERVICES, VIDEO SVS on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to numerous vendors. Please amend your report to disclose the appropriate category.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B and H4 of your report to clarify the following description(s): SUPPLIES. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Line 1 of Schedule I for your Non-Federal Corporate account discloses \$4,791,149.31 in total receipts. The sum of the entries itemized on memo Schedule A, however, indicates the total receipts to be \$4,808,215.22. Please clarify whether this discrepancy.

-On Schedule H4 of your report you disclose transfers to the non-federal account for the federal share of corporate in-kind contributions from Reynolds Plantation that is not consistent with the allocation ratio established on Schedule H1 for the 2002 election cycle.

Please note that the failure to transfer-out the full federal share of these corporate in-kind contributions constitutes an impermissible receipt by your committee.

The Commission recommends that you immediately transfer-out the remaining federal share of the corporate in-kind contributions to your non-federal account or amend your report with clarifying information. Although the Commission may take further legal action concerning this impermissible activity, your prompt action will be taken into consideration.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from Freeman Decorating Co, Alfano Communication, Inc., Vicki Linden Beach, M M Boyce, Mary Coughlin. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

## REPUBLICAN NATIONAL COMMITTEE - RNC PAGE 3

of the date of this letter. <u>Electronic filers must file amendments</u> (to include statements, designation and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toil-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Scott B. Walker

Reports Analyst

Reports Analysis Division

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